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INTERVENTION ORIGINAL  
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Attorneys for Proposed Intervenor  
 Roger K. Ferland  
 Laura Raffaelli

BEFORE THE ARIZONA

POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

In the matter of the Application of Arizona Public Service Company, in conformance with the requirements of Arizona Revised Statutes Section 40-360, et seq., for a Certificate of Environmental Compatibility authorizing the North Valley 230kV Facility Siting Project, including the construction of approximately 31 miles of 230 kV transmission lines, two 230 kV substations, and three substation interconnections in Maricopa County, Arizona, originating at the Westwing Substation in Section 12, Township 4 North, Range 1 West, G&SRB&M and interconnecting at the Raceway Substation in Sections 4 and 5, Township 5 North, Range 1 East, G&SRB&M, continuing to the proposed Avery Substation in Section 15, Township 5 North, Range 2 East, G&SRB&M and the proposed Misty Willow Substation in Section 8, Township 4 North, Range 3 East, G&SRB&M, and terminating at the Pinnacle Peak Substation in Section 10, Township 4 North, Range 4 East, G&SRB&M.

CASE NO. L-00000D-02-0120

MOTION FOR LEAVE TO  
INTERVENE

Arizona Corporation Commission

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## APPLICATION OF ROLES, INC. FOR LEAVE TO INTERVENE

Pursuant to Arizona Administrative Code R14-3-204, Roles, Inc. ("Roles") hereby applies to the Arizona Power Plant and Transmission Line Siting Committee (the "Committee") for an order granting Roles leave to intervene in the above-captioned proceeding. The Committee should grant Roles leave to intervene because Roles will be directly and substantially affected by the transmission line proposed by Arizona Public Service Company ("APS") in its Application

1 for a Certificate of Environmental Compatibility ("CEC") as it is currently designed.

2 Roles is an Arizona corporation specializing in commercial real estate development.  
3 Roles is in the process of developing a parcel of property located on the southeast corner of  
4 Happy Valley Road and Interstate 17 in Phoenix, Arizona (the "Property") for use as a large  
5 shopping center. The Property is part of a long-term commercial lease with the Arizona State  
6 Land Department. Site planning for this project has already been completed and more detailed  
7 working, including securing lessees and design planning, is ongoing.

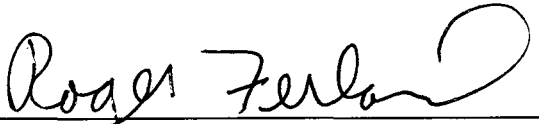
8 Roles is generally supportive of the proposed route for the North Valley 230 Kv Facility  
9 Siting Project described in APS's CEC Application. As currently sited and designed, however,  
10 the proposed transmission line, when combined with the 230Kv transmission line that currently  
11 traverses the Property, will effectively eliminate a significant portion of the area that has been  
12 reserved for parking. The availability of adequate parking space is essential to development of  
13 the Property for use as a shopping center. Thus, without a change in transmission line design and  
14 placement, the economic viability of the Property for its planned purpose will be destroyed. As  
15 an intervenor, however, Roles can provide meaningful comment on well-accepted alternative  
16 designs and line placement that will reduce the impact the transmission line will have on the  
17 Property's parking areas and thereby avoid substantially impairing its value. In this limited role,  
18 Roles' participation in these proceedings will not broaden the issues or unduly delay the  
19 proceedings.

20 For the reasons outlined above, Roles respectfully requests that the Committee grant its  
21 Motion for Leave to Intervene in this matter. Roles requests that all communications in  
22 connection with the above-captioned proceedings be directed to:

23 Roger K. Ferland  
24 Quarles & Brady Streich Lang LLP  
25 One Renaissance Square  
26 Two North Central Avenue  
Phoenix, Arizona 85004-2391

1 RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of October, 2002.

2 QUARLES & BRADY STREICH LANG LLP  
3 One Renaissance Square  
4 Two North Central Avenue  
5 Phoenix, AZ 85004-2391

6 By   
7 Roger K. Ferland  
8 Laura Raffaelli

9 Attorneys for Proposed Intervenor Roles, Inc.

10 ORIGINAL + 28 copies filed this 24<sup>th</sup>  
11 day of October, 2002, with:

12 Arizona Corporation Commission  
13 Docket Control  
14 1200 West Washington Street  
15 Phoenix, AZ 85007

16 COPIES of the foregoing mailed this  
17 24<sup>th</sup> day of October, 2002, to:

18 Ernest Johnson, Director of Utilities  
19 Arizona Corporation Commission  
20 Utilities Division  
21 1200 West Washington Street  
22 Phoenix, AZ 85007

23 Jeffrey B. Guldner  
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